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Holders of Trade Claims*

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

AD HOC COMMITTEE OF HOLDERS
OF TRADE CLAIMS,

Appellant,

v.

PG&E CORPORATION, et al.,

Appellees.

Case No. 20-cv-04570 (HSG)

Bankruptcy Case No. 19-bk-30088 (DM)

**JOINT STIPULATION AND PROPOSED
ORDER REGARDING BRIEFING
SCHEDULE**

JOINT STIPULATION

WHEREAS, on July 3, 2020, the Ad Hoc Committee of Holders of Trade Claims (the “Trade Committee”) filed in the United States Bankruptcy Court of the Northern District of California (the “Bankruptcy Court”) the *Notice of Appeal and Statement of Election to Have Appeal Heard by District Court* [Bankr. D.I. 8261]¹ (the “Notice of Appeal”) with respect to (i) the *Order Confirming Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020* [Bankr. D.I. 8053] entered on June 20, 2020 and (ii) the related *Memorandum Decision – Confirmation of Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization* [Bankr. D.I. 8001] entered on June 17, 2020, which incorporates by reference the Bankruptcy Court’s prior decisions in (x) the *Interlocutory Order Regarding Postpetition Interest* [Bankr. D.I. 5669] entered on February 6, 2020 and (y) the related *Memorandum Decision Regarding Postpetition Interest* [Bankr. D.I. 5226] entered on December 30, 2019;

WHEREAS, on July 17, 2020, the Trade Committee filed the *Trade Committee’s Statement of Issues, Designation of Items to Be Included in the Record, and Certification Regarding Transcripts* [Bankr. D.I. 8443];

WHEREAS, on July 31, 2020, PG&E Corporation and Pacific Gas and Electric Company, as reorganized debtors (the “Reorganized Debtors”), filed the *Reorganized Debtors’ Response to Trade Committee’s Statement of Issues and Designation of Additional Items to Be Included in the Record on Appeal* [Bankr. D.I. 8608];

WHEREAS, the Trade Committee and the Reorganized Debtors have met and conferred regarding a briefing schedule with respect to this appeal;

THE PARTIES HEREBY STIPULATE AND AGREE AS FOLLOWS:

1. The Trade Committee’s principal brief shall be filed no later than September 21, 2020;

¹ “Bankr. D.I.” refers to filings on the docket for *In re PG&E Corporation, et al.*, Ch. 11 Case No. 19-30088 (DM) (Bankr. N.D. Cal.).

2. The Reorganized Debtors' response brief shall be filed no later than October 21, 2020; and

3. The Trade Committee's reply brief shall be filed no later than November 10, 2020.

IT IS SO STIPULATED.

Dated: August 24, 2020

GIBSON, DUNN & CRUTCHER LLP

WEIL, GOTSHAL & MANGES LLP

By: /s/ Michael S. Neumeister

By: /s/ Theodore E. Tsekerides

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Pacific Gas and Electric Company*

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FILER'S ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I, Michael Neumeister, hereby attest that concurrence in the filing of this document has been obtained from counsel for PG&E Corporation and Pacific Gas and Electric Company.

Dated: August 24, 2020

GIBSON, DUNN & CRUTCHER LLP

/s/ Michael S. Neumeister

Michael S. Neumeister (SBN 274220)

*Attorneys for the Ad Hoc Committee of
Holders of Trade Claims*

PROPOSED ORDER


By joint stipulation on August 24, 2020, the parties submitted the *Joint Stipulation and [Proposed] Order Regarding Briefing Schedule* (the “Joint Stipulation”).²

NOW THEREFORE, the Court approves the Joint Stipulation and orders as follows:

1. The Trade Committee’s principal brief shall be filed no later than September 21, 2020;
2. The Reorganized Debtors’ response brief shall be filed no later than October 21, 2020; and
3. The Trade Committee’s reply brief shall be filed no later than November 10, 2020.

IT IS SO ORDERED.

Dated: 8/25/2020


The Honorable Haywood S. Gilliam, Jr.
United States District Judge

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Joint Stipulation.